

**McCARTHY & HOLTHUS, LLP**  
ATTORNEYS AT LAW  
9510 WEST SAHARA AVENUE, SUITE 200  
LAS VEGAS, NV 89117  
TELEPHONE (702) 685-0329/Facsimile (866) 339-5961

**McCARTHY & HOLTHUS, LLP**  
Kristin A. Schuler-Hintz (NSB# 7171)  
khintz@mccarthyholthus.com  
Thomas N. Beckom, Esq. (NSB# 12554)  
tbeckom@mccarthyholthus.com  
9510 West Sahara Avenue, Suite 200  
Las Vegas, NV 89117  
Telephone: (702) 685-0329  
Attorneys for Plaintiff

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

VENTURES TRUST 2013-I-H-R BY MCM  
CAPITAL PARTNERS LLC,

Plaintiff,

v.

SATICOY BAY LLC SERIES 4683  
AMERTRINE, a Nevada Corporation, VILLAS  
AT BLUE DIAMOND SPRINGS  
ASSOCIATION, a Nevada Non-profit  
Corporation, LEVY MILAGROS, an individual,  
DOES INDIVIDUAL I through X; and ROE  
CORPORATIONS XI-XX

Defendants.

Case No. 2:15-cv-01773-JAD-CWH

**STIPULATION FOR EXTENSION OF  
TIME TO OPPOSE SATICOY BAY'S  
MOTION TO DISMISS  
(First Request)**

**ORDER**

COMES VENTURES TRUST 2013-I-H-R BY MCM CAPITAL PARTNERS LLC,  
(hereinafter "Ventures") on the one hand by and through their counsel of record Thomas N.  
Beckom, Esq of the law firm of McCarthy & Holthus LLP; and SATICOY BAY LLC SERIES  
4683 AMERTRINE ("Saticoy") by and through their counsel of record Michael F. Bohn, Esq of  
the law firm of the Law Offices of Michael F. Bohn and hereby file this Stipulation and Order  
Extending the Deadlines for Ventures to respond to Saticoy's Motion to Dismiss filed on  
November 13, 2015 pursuant to LR 6-1.

**RECITALS**

1. On November 13, 2015 Saticoy filed a Motion to Dismiss the Quiet Title Complaint filed by Ventures. Currently responses are due by November 30, 2015 and as such this stipulation has been filed timely pursuant to LR 6-1.
2. Ventures has not previously asked for extension to respond to this motion.
3. Ventures respectfully request additional time to respond to Saticoy's Motion in light of the Thanksgiving Holiday. The Opposition is currently due the Monday after Thanksgiving and the law offices of McCarthy Holthus will be closed for Thanksgiving and Family day. Counsel for Ventures is married with a four (4) year old daughter and would like to be able to spend Thanksgiving with his family. Given that this matter is in federal court which requires the upmost attention and precision; Ventures respectfully requests an extension of time to respond so that the highest quality product is put before the Court.

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**STIPULATION**

It is hereby **STIPULATED** that Ventures shall have until December 14, 2015 to respond to Saticoy's Motion to Dismiss filed November 13, 2015.

DATED this 23<sup>rd</sup> day of November, 2015

DATED this 23<sup>rd</sup> day of November, 2015

**LAW OFFICE OF MICHAEL F. BOHN**

**McCARTHY & HOLTHUS, LLP**

/s/ Michael F. Bohn, Esq

/s/ Thomas N. Beckom, Esq


Michael F. Bohn, Esq  
Nevada Bar No. 1641  
376 E. Warm Spring Rd.  
Las Vegas, NV 89119  
Attorney for *Saticoy Bay LLC*  
*Series 4683 Ameritrine*

Kristin A. Schuler-Hintz, Esq  
Nevada Bar No. 7171  
Thomas N. Beckom, Esq  
Nevada Bar No. 12554  
9510 West Sahara Avenue, Suite 200  
Las Vegas, Nevada 89117  
*Attorney for the Venture Trust*

**ORDER**

**IT IS SO ORDERED**

Dated: November 23, 2015.

  
UNITED STATES DISTRICT JUDGE

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